

**FILED**

August 7, 2024

**SEALED**

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
By: RR  
Deputy

**Case No: SA:24-CR-00366-OLG**

**UNITED STATES OF AMERICA**

**Plaintiff**

**v**

**ALBERTO SANCHEZ**

**Defendant**

**INDICTMENT**

**COUNT 1: 18 U.S.C. § 922(o)  
Illegal Possession of Machinegun**

**COUNT 2: 18 U.S.C. §§ 933(a)(1)  
Firearms Trafficking**

**Notice of Government's Demand for  
Forfeiture**

**THE GRAND JURY CHARGES:**

**COUNT ONE  
[18 U.S.C. § 922(o)]**

On or about June 11, 2024, in the Western District of Texas, Defendant,

**ALBERTO SANCHEZ,**

did knowingly possess a machinegun, that is a Glock handgun, which was equipped with a conversion device that made it capable of firing automatically more than one shot, without manual reloading, by a single function of the trigger, in violation of Title 18, United States Code, Section 922(o).

**COUNT TWO  
[18 U.S.C. § 933(a)(1)]**

On or about June 11, 2024, in the Western District of Texas, Defendant,

**ALBERTO SANCHEZ,**

did ship, transport, transfer, cause to be transported, or otherwise dispose of a firearm, to wit: a Glock, model 23, .40 Smith & Wesson caliber firearm, serial number BDZ840 and a Glock, model 17 Gen 4, 9mm Luger caliber firearm, serial number BEZT367, to a person in or otherwise affecting commerce, knowing or having reasonable cause to believe that the use, carrying, or possession of the firearm by the recipient would constitute a felony, to wit, Illegal Possession of a Machinegun, all in violation of Title 18, United States Code, Section 933(a)(1).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2]**

**I.**

**Firearm Violation and Forfeiture Statutes**

**[Title 18 U.S.C. § 922(o), subject to forfeiture  
pursuant to Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture  
by Title 28 U.S.C. § 2461(c)]**

As a result of the criminal violation set forth in Counts One, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 924(d)(1), made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c), which states:

**Title 18 U.S.C. § 924. Penalties**

**(d)(I)** Any firearm or ammunition involved in or used in any knowing violation of subsection . . . (o) . . . of section 922 . . . shall be subject to seizure and forfeiture . . . under the provisions of this chapter. . . .

**II.**

**Firearm Violation and Forfeiture Statutes**

**[Title 18 U.S.C. § 933(a)(1) and (a)(3) subject to forfeiture pursuant to  
Title 18 U.S.C. § 934(a)(1)(A) and (B)]**

As a result of the criminal violation set forth in Count Two, the United States of America gives notice to the Defendant of its intent to seek the forfeiture of certain property upon conviction and pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 934(a)(1)(A) and (B), which state:

**Title 18 U.S.C. § 934. Forfeiture and Fines.**

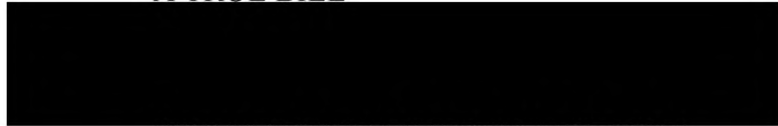
**(a) Forfeiture. --**

**(1) In general.** -- Any person convicted of a violation of section 932 or 933 shall forfeit to the United States, irrespective of any provision of State law--

(A) any property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as the result of such violation; and

(B) any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation . . .

A TRUE BILL



FOREPERSON OF THE GRAND JURY

JAIME ESPARZA  
UNITED STATES ATTORNEY

BY:

A handwritten signature in blue ink, appearing to read "Eric Fula", written over a horizontal line.

FOR AMANDA C. BROWN  
Assistant United States Attorney